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From: Jacob Odekirk
To: Meyer, Dan
Cc: Hardesty, Doug; Thomas Mosher; Kyle Heitkamp
Subject: RE: PotlatchDeltic Discussion
Date: Monday, November 30, 2020 10:37:32 AM
Attachments: image006.png

Dan,

Thank you for your work to revise the monitoring conditions in our Kiln 6 permit. PotlatchDeltic requested those revisions on March 11, 2020. We reported to our management that those revisions are complete and ready for reissuance, as you summarized in our recent call. We request that EPA complete that work and reissue the permit with the new monitoring conditions for our mill. At this time, we do not see any reason or benefit to revise our emissions limits, as you suggest in your November 23, 2020 email. Our recent test data confirms compliance with the current baghouse limits. In the future, if our business plans prompt future modifications of the source, then review of the permitted emissions limits may be appropriate. At this time we have no such business plans. Please reissue the permit with the revised monitoring conditions at your earliest convenience.

Jacob Odekirk
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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Monday, November 23, 2020 10:47 AM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>
Cc: Hardesty, Doug <Hardesty.Doug@epa.gov>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thank Jacob. How about we meet tomorrow, Tuesday? Doug and I are available after 10:30 am pacific. During the call, we'll explain the calculations in the attached workbook and the basis for revising the daily and annual limits for PCWR-PM-SH (BH-2) and PCWR-PM-SD (BH-3) as illustrated below given the 2020 source test results. I think no more than an hour is needed for the meeting. Let me know what time works best for you tomorrow after 10:30 am pacific, and I'll send out an MS Teams meeting invite. If some other day/time is preferable, let me know that too. Thanks.

3.8 Emissions shall not exceed the daily emission limits in Table 3-1. Unless otherwise required in this permit, compliance with these limits is determined by multiplying each emission factor in Table 3-1 (pounds per unit of operation) by the daily operation specified in Table 3-1, except as required in Condition 3.11.

Table 3-1 – Daily PM2.5 Emission Limits, pounds per day

Emission Unit	Emission Limit	Emission Factor, units	Operation
LK-6	9.52	0.0510 lb/mbf lumber	Condition 4.2.5
PB-1	15.37	0.01488 lb/mlb steam	Condition 4.4.1
PB-2	16.98	0.00722 lb/mlb steam	Condition 4.4.1
PCWR-PM-SH	~~19.756.53~~	~~0.82290.0026~~ 3 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-SD	~~17.775.77~~	~~0.74060.0022~~ 9 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-PTB	3.95	0.1646 lb/hr	Condition 4.5.2
PCWR-PM-PSB	3.95	0.1646 lb/hr	Condition 4.5.1
PCWR-SM-SD	31.87	1.3280 lb/hr	Condition 4.5.3
PCWR-SM-SDB	6.98	0.2907 lb/hr	Condition 4.5.3
PCWR-SM-CH	26.23	1.0929 lb/hr	Condition 4.5.3
PT	19.39	0.8079 lb/hr	Condition 4.5.3

3.9 Emissions shall not exceed the annual emission limits in Table 3-3. Unless otherwise required in this permit, compliance with these limits is determined by multiplying each emission factor in Table 3-3 (pounds per unit of operation) by the annual operation specified in Table 3-3, except as required in Condition 3.11.

Table 3-3 – Annual PM2.5 Emission Limits, tons per year

Emission Unit	Emission Limit	Emission Factor, units	Operation
LK-6	1.74	0.0510 lb/mbf lumber	Condition 4.2.2
PB-1	2.28	0.01488 lb/mlb steam	Condition 4.4.1
PB-2	3.10	0.00722 lb/mlb steam	Condition 4.4.1
PCWR-PM-SH	~~3.081~~.01	~~0.82290~~.00263 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-SD	~~2.770~~.90	~~0.74060~~.00229 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-PTB	0.62	0.1646 lb/hr	Condition 4.5.2
PCWR-PM-PSB	0.62	0.1646 lb/hr	Condition 4.5.1
PCWR-SM-SD	4.97	1.3280 lb/hr	Condition 4.5.3
PCWR-SM-SDB	1.09	0.2907 lb/hr	Condition 4.5.3
PCWR-SM-CH	4.09	1.0929 lb/hr	Condition 4.5.3
PT	2.52	0.8079 lb/hr	Condition 4.5.3

It is my impression that complying with the new PM2.5 limits for PCWR-PM-SD and PCWR-PM-SH will not be a problem for PotlatchDeltic as illustrated below:

PCWR-PM-SH

Effective daily planer throughput limit = (6.53 lb/day) * (mbf/0.00263 lb) = 2,483 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (1.01 ton/yr) * (mbf/0.00263 lb) * (2000 lb/ton) = 768,061 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

PCWR-PM-SD

Effective daily planer throughput limit = (5.77 lb/day) * (mbf/0.00229 lb) = 2,520 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (0.90 ton/yr) * (mbf/0.00229 lb) * (2000 lb/ton) = 786,026 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Friday, November 20, 2020 11:21 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>
Subject: RE: PotlatchDeltic Discussion

Yes, Monday or Tuesday would be best.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
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Subject: RE: PotlatchDeltic Discussion

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Thanks Jacob. Let me get on this. During the call, Doug and I spoke of getting together with you again to explain next steps. That could happen as early as next week. Are you around next week?

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Sent: Friday, November 20, 2020 10:49 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

Dan,

Attached are the updated run sheets. I certainly had my doubts on whether Shane could locate these, but he was able to track down the data. “Input Boards” is lumber going into the planer.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Thursday, November 19, 2020 10:48 AM
To: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thanks everyone for attending today’s call. Based upon my understanding of the situation after knowledge gained during the call, R10 is requesting 03/17/20 planer throughput data for time periods highlighted in yellow.

EU: BH-2	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	16:22 - 17:38	32.75	16:22:00 - 16:54:45	31.25	17:06:45 - 17:38:00
2	17:55 - 19:04	31.25	17:55:00 - 18:26:15	31.75	18:32:15 - 19:04:00
3	19:13 - 20:24	32.00	19:13:00 - 19:45:00	32.25	19:51:45 - 20:24:00
				For each run, we need volume (bf) of lumber entering the planer during these two time periods.	

EU: BH-3	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	10:10 - 11:28	29.50	10:10:00 - 10:39:30	29.75	10:58:15 - 11:28:00
2	12:05 - 13:14	29.25	12:05:00 - 12:34:15	30.5	12:43:30 - 13:14:00
3	13:42 - 14:52	30.5	13:42:00 - 14:12:30	30.25	14:21:45 - 14:52:00
				For each run, we need volume (bf) of lumber entering the planer during these two time periods.	

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-----Original Appointment-----
From: Kyle Heitkamp <kheitkamp@ramboll.com>
Sent: Thursday, November 19, 2020 8:22 AM
To: Meyer, Dan; Hardesty, Doug; Jacob Odekirk (Jacob.Odekirk@PotlatchDeltic.com); Thomas Mosher; Shane Hammons; Bo Wilkins
Subject: PotlatchDeltic Discussion
When: Thursday, November 19, 2020 8:00 AM-8:30 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

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